



TRI-STATE GENERATION AND TRANSMISSION ASSOCIATION, INC.

HEADQUARTERS: P.O. BOX 33695 DENVER, COLORADO 80233-0695 303-452-6111

September 8, 2008

Mr. John Bunyak
Air Resources Division
National Park Service
P.O. Box 25287
Denver, Colorado 80225

Transmitted also via e-mail to: john_bunyak@nps.gov

RE: Comments on the draft FLAG Phase I Report – Revised

Dear Mr. Bunyak:

Tri-State Generation and Transmission Association, Inc. (Tri-State) transmits this letter to provide comment about the Federal Land Managers' Air Quality Related Values Work Group Phase I Report – Revised (FLAG 2008). Tri-State is a not-for-profit, wholesale electric power supply cooperative providing power to 44 member distribution systems serving customers throughout a 250,000 square-mile territory in Colorado, Nebraska, New Mexico and Wyoming. Tri-State provides electricity to members based on a diverse mix of generation sources including coal, natural gas, hydroelectric, and wind power.

Tri-State is a member of the Western Business Roundtable and WEST Associates and supports the extensive comments about FLAG 2008 provided by each of those organizations. In particular, Tri-State supports the Western Business Roundtable's overarching legal comments about how FLAG continues to contain provisions that make it much more significant than a "guidance document". FLAG 2008 is essentially a regulation that continues to place a disproportionate burden on western states by exempting from consideration Federal Land Managers' (FLM) activities impacts on Air Quality Related Values, and providing FLM with influence over activities on non-federal land that is not supported by statute. Therefore, Tri-State directs attention to the Western Business Roundtable's points that speak to the lack of a legal underpinning for FLAG 2008.

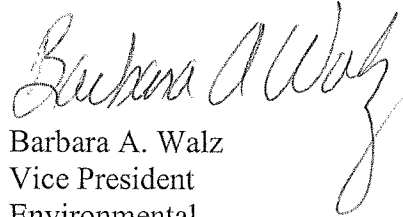
Within that important context, Tri-State appreciates efforts put forth by FLM to revise the first edition of FLAG based on experience to make the processes therein more workable and streamlined. Tri-State supports the comments made by WEST Associates. Given the provisions that have been implemented by FLAG for 7+ years, FLAG 2008 contains several technical changes intended to streamline the process, and reduce the administrative interference of FLAG in the permitting of energy generation projects. Importantly, there are issues that need further review and study to arrive at a still more workable solution. Therefore, Tri-State directs attention to the WEST Associates' comments about the proposed revised components of FLAG 2008.



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Thank you for the opportunity to comment. Please contact me if you have questions or would like clarification.

Sincerely,


Barbara A. Walz
Vice President
Environmental

BAW:AB:pvt

cc: Mac McLennan
Mike Barningham
Andy Berger
Gigi Dennis
Heidi Wagner
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